

# **Exhibit "18"**

statement, prepare proper documentation and escort a detained Japanese national to a Japan-bound flight departing at 1:30 p.m.;

(2) On January 28, 1998, Brehm ordered Plaintiff to complete three files by the end of the day and further ordered Plaintiff not to speak to other Senior Immigration Inspectors concerning the assignments given to him on that date;

(3) On March 17, 1998, Brehm assigned Plaintiff to work at the secondary inspection station for the third consecutive day, which assignment was not consistent with the established rotational work policy established for the Honolulu Airport.

h. Between January 6, 1998 and February 11, 1998, Brehm ordered Plaintiff to perform work unrelated to his position as a Senior Immigration Inspector. Specifically, for a period of over one month, Plaintiff was ordered, from time to time, to work at Primary Inspections with GS-5/7 Immigration Inspectors, which assignment is outside the scope of his position description and is viewed as a disciplinary action.

12. On March 2, 1998, Plaintiff initiated the administrative process required to file a discrimination complaint against his supervisors, primarily Brehm. Since March 2, 1998, Plaintiff was subjected to disparate treatment based on his race, national origin and reprisal for his initiation of the administrative process established for the filing of a discrimination complaint, as follows:

a. On March 5, 1998, Brehm began to criticize Plaintiff's report writing and to direct that petty unnecessary changes be made on many of the narrative reports that Plaintiff submitted to Brehm;

b. On April 8, 1998, Brehm told Plaintiff, at his work station, that he was to report to the District Office regarding his discrimination complaint. This action caused Plaintiff